

**From:** Jeff Raines <JRaines@techlawinc.com>  
**To:** R5ORC.R5ORC1 (ESTES-SHERRY)  
**Date:** 26 Aug 1998 14:09  
**Subject:** Site Visit: Chicago Shredding and Scrap Corporation of America

Sherry

John Gaitskill and I visited the Chicago Shredding/Scrap Corporation of America facility at 12901 South Stony Island Boulevard on August 24, 1998 between 9 AM and 12 Noon. We were accompanied by Mr. Terry Coogan, Esquire of Chicago Shredding, Mr. Mark LaRose, Esquire, the Cozzi outside council and Mr. Ron Traviseno of Cozzi.

The facility is currently undergoing closure as a scrap processing facility. Cozzi Iron & Metal has bought the equipment used at the facility for scrap processing (shredder, baler, shear, rolling stock) and some, but not all, of the scrap material present on site. Cozzi is currently shredding the remaining materials on site. They have until November 15th to complete the decommissioning of the facility. If they do not complete the decommissioning by November 15th, the only penalty is that they will have to pay additional rent. It looks like they will have completed processing all of the scrap on site well before November 15th.

Mr. Coogan seemed to think the property itself, which he referred to as the only significant dock space on the canal in private hands, had a high value. Midwest Metallics intends to continue operating a loading/unloading operation at the facility for barges and rail cars.

The facility did not appear to have many of the environmental problems observed at the other Cozzi facilities. We did not observe drums of waste oil scattered about the facility, pools of collected oil from metal turnings, or a steady drip of hydraulic fluid into a city sewer. This may be due, however, to the fact that the facility has not taken in any new scrap since July 14th of this year, the date of Cozzi's purchase of the facility equipment and scrap (with some economic value).

There were a number of piles of materials present at the site, that were not purchased by Cozzi, that may be problematic. Some of the piles were characterized as "dirt", though chunks of scrap metal were sticking out of them. A few of the piles consisted of "mill scale" which is a very fine metal muck that results from metal finishing processes. Mill scale was also observed at the Cozzi South Paulina facility. The Cozzi plant manager, Tom Cohrs, explained that they didn't want mill scale because it had little value, but they took it as a service to their customers.

The most problematic pile at the facility consists of "beach tank fines" (BTF). This pile, located next to 130th Street, contains 3,000 to 5,000 cubic yards of BTF. BTF result from the shredder operations. The wet shredder has a four-foot deep water tank (beach tank) below the electro magnets where the non-ferrous shredder residue falls. Rotating paddle wheels remove the non-ferrous shredder residue from the beach tank and dump the material in a pile beside the building. The BTF materials consist of the silt-like materials that fall to the bottom of the beach tank. These fines are reported by Mr. Coogan to be 45% metallic.

Prior to 1995, the facility piled the materials next to 130th Street. Since 1995, Chicago Shredding, and likely every other wet shredder operator in the country, has been mixing the BTF with the non-ferrous autoshrredder residue. The problems associated with the BTF at Chicago Shredding are 1) the pile of BTF is almost certain to fail a TCLP metals and 2) the current industry practice of mixing the BTF with the non-ferrous autoshrredder residue is probably treatment of a hazardous waste by dilution. Chicago Shredding is likely to make a claim that the BTF is not a waste, however, it does not appear to have any value and their storage of it on site is likely to fall into the category of "speculative accumulation".

I will keep you informed of our plans and progress.

**From:** Jeff Raines <JRaines@techlawinc.com>  
**To:** R5WST.R5RCRA(FREEMAN-BRIAN)  
**Date:** 25 Aug 1998 10:06  
**Subject:** Site Inspection at Chicago Shredding

Brian

John Gaitskill and I visited the Chicago Shredding/Scrap Corporation of America facility at 12901 South Stony Island Boulevard on August 24, 1998 between 9 AM and 12 Noon. We were accompanied by Mr. Terry Coogan, Esquire of Chicago Shredding, Mr. Mark LaRose, Esquire, the Cozzi outside council and Mr. Ron Traviseno of Cozzi.

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John Gaitskill is currently consulting with Sherry Estes regarding our next step at the Chicago Shredding facility. I will keep you informed of our plans and progress.

CC: R5CHG.IN("PBrown-Derocher@techlawinc.com")

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

**DATE:** 14 July 1998

**SUBJECT:** Entry Denial for Inspection at Midwest Metallics, Summit, IL  
ILD 054 348 974

**FROM:** John Gaitskill, Environmental Engineer *JHG*  
Illinois/Indiana Section  
Enforcement and Compliance Assurance Branch

**TO:** file

On 13 July 1998 at approximately 10:00, I arrived at the Midwest Metallics facility at 7955 West 59th Street, Summit, Illinois. The visit for the purpose of site familiarization to determine compliance with the RCRA statutes and pursuant regulations. Upon arrival at the premises, I observed that the guard house at the front gate was unoccupied and the gate was open. I noted an office near the scales and entered. In the vestibule, I identified myself and presented my credentials to the person in the office. He left and the person who returned with my credentials identified himself as Terence Coogan. I explained that the purpose of my visit was to view the activities of the facility with regard to RCRA regulations, and that I was a newly assigned engineer to the facility and wanted to become familiar with the processes.

Mr. Coogan indicated that he would not be able to escort me for the inspection, and there was no one else available. He asked me come back another time. I asked if 15 July 1998 would be acceptable. He said no, I should call the week of 20 July. He said he was in the process of shutting down the operations at the site.

After taking a few photographs from off the premises, I returned to the office without conducting the inspection.

cc: Sherry Estes, ORC  
Lorna Jereza

